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**REPORT ON THE  
 FILING OR DETERMINATION OF AN  
 ACTION REGARDING A PATENT OR  
 TRADEMARK**

In Compliance with 35 § 290 and/or 15 U.S.C. § 1116 you are hereby advised that a court action has been filed in the U.S. District Court Northern District of California on the following  Patents or  Trademarks:

DOCKET NO. CV 11-03450 PSG	DATE FILED 7/14/2011	U.S. DISTRICT COURT 280 South First Street, Rm 2112, San Jose, CA 95113
PLAINTIFF SECUGEN CORP.	DEFENDANT SUPREMA INC.	
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1 6,324,020		SEE ATTACHED COMPLAINT
2		
3		
4		
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In the above—entitled case, the following patent(s) have been included:

DATE INCLUDED	INCLUDED BY <input type="checkbox"/> Amendment <input type="checkbox"/> Answer <input type="checkbox"/> Cross Bill <input type="checkbox"/> Other Pleading	
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
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In the above—entitled case, the following decision has been rendered or judgement issued:

DECISION/JUDGEMENT
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CLERK Richard W. Wicking	(BY) DEPUTY CLERK Betty Walton	DATE July 20, 2011
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Copy 1—Upon initiation of action, mail this copy to Commissioner    Copy 3—Upon termination of action, mail this copy to Commissioner  
 Copy 2—Upon filing document adding patent(s), mail this copy to Commissioner    Copy 4—Case file copy

2011 JUL 14 A 10 49  
RICHARD W. HICKING  
CLERK, N.D. OF CALIFORNIA  
4TH FLOOR, DISTRICT COURT

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11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA

14 SAN FRANCISCO DIVISION

15 SecuGen Corporation,

CV 11 3-10-11

No.

16 Plaintiff,

COMPLAINT FOR PATENT  
INFRINGEMENT

v.

17 Suprema, Inc.,

DEMAND FOR JURY TRIAL

18 Defendant.

PSG

20  
21 Plaintiff SecuGen Corporation ("SecuGen") for its Complaint against Suprema, Inc.  
22 ("Suprema") alleges as follows:

23 NATURE OF ACTION

24 1. This is an action for patent infringement arising under the patent laws of the United  
25 States, Title 35, United States Code, §§ 100 et seq.

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COMPLAINT FOR PATENT INFRINGEMENT (DEMAND FOR JURY TRIAL)

## PARTIES

2. Plaintiff SecuGen is a corporation organized and existing under the laws of the State of Delaware, having its principal place of business at 2065 Martin Avenue, Suite 108, Santa Clara, CA 95050.

3. On information and belief, Defendant Suprema is a corporation organized and existing under the laws of the Republic of Korea, having its principal place of business at 16F Parkview Office Tower, Jeongja-dong, Bundang-gu Seongnam, Gyeonggi, South Korea.

## JURISDICTION AND VENUE

4. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400(b).  
Suprema is transacting, doing and/or soliciting business and committing acts of patent  
infringement in this judicial district and elsewhere in the United States.

## BACKGROUND

6. Plaintiff SecuGen is a leading provider of biometric devices including fingerprint recognition devices ("FRD"). An FRD is a device used to identify any individual by his or her fingerprint. FRDs have a variety of uses including, among other things, providing security for electronic devices such as computers, door locks, and cell phones.

7. On November 27, 2001, U.S. Patent No. 6,324,020 ("the '020 patent") entitled "Method and Apparatus for Reduction of Trapezoidal Distortion and Improvement of Image Sharpness in an Optical Image Capturing System" was duly and legally issued to inventors Harry H. Teng and Sung-Chan Jo. SecuGen is the owner by assignment of all rights, title and interest in the '020 patent.

8. The technology disclosed and claimed in the '020 patent is directed to optics modules used in FRDs. Defendant Suprema imports into the United States, offers to sell, distributes and sells within the United States infringing FRDs including, among others, Access Control/Time Attendance FRDs (including but not necessarily limited to the BioStation series, the

1 BioEntryPlus series, the BioLiteNet series, the BioStation T2, the D-Station, and the BioLite Solo  
2 FRDs), Embedded Modules FRDs ((including but not necessarily limited to the SFM3020-OP,  
3 SFM3030-OD, SFM3520-OP, SFM3530-OD, SFM4020-OP, SFM3040-OC and SFM2020-OP  
4 FRDs) and PC solutions FRDs ((including but not necessarily limited to the BioMini,  
5 BioMiniPlus, SFU300, and SFU500). The foregoing devices listed in this paragraph will be  
6 referred to collectively herein as the “Suprema FRDs.”

**FIRST CAUSE OF ACTION  
(Infringement of the '020 patent)**

9           9. SecuGen incorporates the allegations set forth in Paragraphs 1-9 above as if fully  
10 set forth herein.

11        10. The Suprema FRDs that Suprema imports into the United States, and distributes,  
12 offers to sell and sells within the United States include optics modules that are covered by one or  
13 more claims of the '020 patent.

14        11. Suprema's importation into the United States, and offers to sell, distribution, and  
15 sales within the United States of the Suprema FRDs that contain optics modules that are covered  
16 by one or more claims of the '020 patent is unauthorized.

17       12. Suprema's importation into the United States, and distribution, offers to sell and  
18 sales within the United States of Suprema FRDs that contain optics modules that are covered by  
19 one or more claims of the '020 patent thus constitutes infringement of the '020 patent in violation  
20 of 35 U.S.C. § 271(a).

13. Suprema is aware of the '020 patent, but yet it knowingly and actively induces  
third-parties to use infringing Suprema FRDs within the United States. Suprema thus actively  
induces infringement of the '020 patent in violation of 35 U.S.C. § 271(b).

24        14. The optics modules incorporated into the Suprema FRDs that Suprema imports into  
25 the United States, distributes, offers to sell and sells within the United States are not staple articles  
26 or commodities of commerce and have no substantial non-infringing use. On information and  
27 belief, Suprema knows that such optics modules are especially made or especially adapted for use

in an infringement of the '020 patent. Third-parties who use Suprema's FRDs infringe one or more claims of the '020 patent.

15. Suprema thus contributes to infringement of the '020 patent in violation of 35 U.S.C. § 271(c).

16. Suprema's acts of infringement are willful. Suprema knew and knows of the '020 patent and that its FRDs infringe the '020 patent.

17. Suprema's acts of infringement have caused irreparable harm to SecuGen and SecuGen will continue to suffer such irreparable harm unless Suprema is preliminarily and permanently enjoined by this Court.

## PRAYER

By reason of the foregoing, SecuGen respectfully requests that this Court:

- (a) enter judgment that Suprema has infringed the '020 patent;
  - (b) enter judgment that Suprema's acts of patent infringement are willful;
  - (c) preliminarily and permanently enjoin Suprema, its officers, subsidiaries, affiliates distributors, agents, servants, employees, attorneys, and all persons in active concert with it, from any further infringement of the '020 patent;
  - (d) award damages, costs, and prejudgment interest to SecuGen under 35 U.S.C. § 284;
  - (e) declare this case exceptional and award SecuGen its reasonable attorneys' fees pursuant to 35 U.S.C. § 285;
  - (f) award SecuGen treble damages for Suprema's willful infringement; and
  - (g) award SecuGen such other relief as this Court deems just and proper.

Dated: July 13, 2011

Respectfully submitted,

By: /s/ Brian E. Mitchell  
Brian E. Mitchell

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**DEMAND FOR JURY TRIAL**

Pursuant to Fed. R. Civ. P. 38, SecuGen hereby demands trial by jury of all issues triable to a jury.

Dated: July 13, 2011

Respectfully submitted,

By: /s/ Brian E. Mitchel  
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